

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20114-KMW

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CARLOS RAMON POLIT FAGGIONI,

Defendant.

_____ /

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE OBJECTIONS TO PSI**

Defendant Carlos Polit (“Polit”), through undersigned counsel, respectfully requests a one-week extension of time to file his objections to the Presentence Investigation Report (the “PSI”), through August 19, 2024, due to the press of other professional and personal conflicts. In support of this Motion, Polit submits the following:

1. The PSI was filed on July 29, 2024. ECF#224.
2. Pursuant to Rule 32 of the Federal Rules of Criminal Procedure, the deadline to file objections to the PSI is currently scheduled for August 12.
3. Undersigned counsel Perczek is currently scheduled to commence a jury trial for two weeks beginning on August 9, 2024, in the Fifteenth Judicial Circuit

of Florida, Palm Beach County, in *Mendelsohn, et. al. v. Ecclestone*, Case No. 50-2017-CA-010386-XXXX-MB.

4. Moreover, undersigned counsel Gomez is traveling out of the country this week through August 10, 2024.

5. Pursuant to the press of counsels' professional obligations and personal conflicts, Polit respectfully requests a one-week extension of time to file his objections to the PSI through August 19, 2024.

6. This Motion is made in good faith, not for purposes of delay, and will not affect the sentencing currently scheduled for September 4, 2024.

7. The government does not object to the relief requested.

8. Accordingly, Polit requests through August 19, 2024, to file his objections to the PSI.

Respectfully submitted,

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